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Hon. Brian D. Lynch Chapter 13

Hearing date: Thu. 9/13/18

at 1:30 p.m.

Response Date: 9/6/18

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

In re:

CLAIREASE LEANN FONTAINE.

Debtor.

NO. 18-40906-BDL

MOTION OF SECURED CREDITOR AMERICA'S CREDIT UNION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW America's Credit Union by and through its attorneys, Siderius, Lonergan & Martin, LLP, and moves the court for relief from the automatic stay provisions of 11 USC § 362. Said secured creditor holds a perfected security in a 2017 Ford F-150 automobile. Secured creditor America's Credit Union requests relief from the stay to allow repossession of said vehicle. Secured party also requests waiver of the provisions of BR 4001 (a)(3) so that it may forthwith commence or continue repossession through appropriate legal channels. The factual basis for this motion is set forth in the declaration submitted herewith.

DATED this 14th day of August, 2018.

/s/ Michael F. Sherman Michael F. Sherman, of SIDERIUS, LONERGAN & MARTIN, LLP Attorneys for America's Credit Union WSBA #45485

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